

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN A. GRIFFIN,)	FILED: JUNE 9, 2008
)	08CV3323
Petitioner,)	JUDGE COAR
v.)	Case No. MAGISTRATE JUDGE MASON
)	
TANYA GRIFFIN,)	PH
)	
Respondent.)	

**PETITION FOR RETURN OF CHILDREN TO PETITIONER PURSUANT TO THE
HAGUE CONVENTION ON THE CIVIL ASPECTS OF INTERNATIONAL CHILD
ABDUCTION, THE INTERNATIONAL CHILD ABDUCTION REMEDIES ACT AND
THE UNIFORM CHILD CUSTODY JURISDICTION AND ENFORCEMENT ACT**

COMES NOW Petitioner, JOHN A. GRIFFIN ("Petitioner/Father"), and appears specially by and through undersigned counsel, as and for his Petition For Return Of Children To Petitioner Pursuant To The Hague Convention On The Civil Aspects Of International Child Abduction, The International Child Abduction Remedies Act And The Uniform Child Custody Jurisdiction And Enforcement Act, alleges as follows:¹

THE PARTIES

Petitioner, JOHN A. GRIFFIN, is a citizen of Ireland, residing at **Radharc Darach, Apartment #6, Belmont, Nenagh, County Tipperary, Ireland**. Petitioner is the father of Samuel Muiris Griffin, (13 years old), Isaac James Griffin (10 years old), Margaret Eleanor Griffin (8 years old), and Josephine Marie Griffin (6 years old).

¹ This Petition is further supported by the Memorandum of Law in Support of Petition for Return of Children; The Affidavit of Monica Tynan; The Affidavit of John Griffin; and the Declaration Establishing the Habitual Residence of Children Samuel Griffin, Isaac Griffin, Margaret Griffin and Josephine Griffin, filed concurrently herewith. Petitioner/Father reserves the right to submit additional evidence and authorities in support of this Petition.

Respondent, TANYA GRIFFIN, a United States citizen, was a resident of Ireland and her last known address in Ireland was 1 Bernadette Place, Western Road, Cork City, Ireland. Upon information and belief, Respondent currently resides at 343 6th Street, LaGrange, Illinois 60525. Respondent is the mother of Samuel, Isaac, Margaret and Josphine.

JURISDICTION AND VENUE

1. This Petition is brought pursuant to the Convention on the Civil Aspects of International Child Abduction, done at the Hague on the 25th of October, 1980 (the "Hague Convention"), 42 U.S.C. § 11603(b), the International Child Abduction Remedies Act (the "ICARA"), A.R.S. §25-1001 *et seq.* and the Uniform Child Custody Jurisdiction and Enforcement Act.

2. The Convention became effective on July 1, 1988. The objects of the Convention are:

- a. Article 1(a): To ensure the prompt return of children wrongfully removed to or retained in any Contracting State; and
- b. Article 1(b): To ensure that rights of custody and of access under the law of one Contracting State are effectively respected in the other Contracting States.

3. This Court has jurisdiction pursuant to 42 U.S.C. §11603 and A.R.S. §§25-1005 and 25-1031.

4. Respondent is wrongfully retaining the children in Chicago, IL and, therefore, venue is proper pursuant to 28 U.S.C. § 1391.

GENERAL FACTUAL ALLEGATIONS

5. Petitioner and Respondent were married in St. Louis, Missouri on July 14, 1990. The parties have four minor children in common, namely, Samuel Muiris Griffin, who was born on January 19, 1995, Isaac James Griffin, who was born on February 6, 1998, Margaret Eleanor

Griffin, who was born on July 31, 1999, and Josephine Marie Griffin, who was born on April 27, 2002, all for whom this Petition has been filed. (*See Hague Convention Application, attached as Ex. A to Affidavit of Monica Maria Tynan in Support of Petition for Return of Children to Petitioner Pursuant to the Hague Convention on the Civil Aspects of the International Child Abduction Remedies Act and the Uniform Child Custody Jurisdiction and Enforcement Act*) (hereinafter "Tynan Aff.") All four children are under the age of 16.

6. Petitioner and Respondent have been separated since June 2007. Upon information and belief, the Respondent has filed a divorce proceedings in Cook County, Illinois, Case No. 2007 D 009459. Default judgment was entered on March 10, 2008.

7. The children were all born in the United States but moved to Ireland in May and June 2005. They are all legal residents of Ireland. (*See Griffin Aff. ¶ 7, attached as Ex. C to Tynan Aff.*)

WRONGFUL RETENTION BY RESPONDENT

8. On June 9, 2007, Respondent took the children from Ireland to the United States without the Petitioner's consent. (*See Griffin Aff. ¶ 3, attached as Ex. C to Tynan Aff.*)

9. Some time after arriving in the United States in June of 2007, Respondent confirmed that she did not intend to return to Ireland and that the children were staying with her in the United States. (*See Griffin Aff. ¶ 4, attached as Ex. C. to Tynan Aff.*)

10. Respondent wrongfully removed the minor children from Ireland into the United States and did so in breach of Petitioner's right of custody within the meaning of Article 3 of the Convention.

11. At all times prior to the abduction, Petitioner was actually exercising custody over the minor children within the meaning of Articles 3 and 5 of the Convention, and, but for the

wrongful removal and retention of the minor children by Respondent, would have continued to exercise such custody rights.

12. Prior to the wrongful removal by Respondent, the minor children were habitual residents of the Country of Ireland within the meaning of Article 3 of the Convention. All four children lived in Ireland from May and June 2005 until their wrongful removal in June 2007. (*See* Griffin Aff. attached as Ex. C to Tynan Aff. and Griffin Dec. attached as Ex. B to Tynan Aff.)

13. After the wrongful removal of the minor children by Respondent, she sent Petitioner correspondence, indicating that the children would stay with her in Chicago and that she would provide them with the proper schooling and adequate care. (*See* Griffin Aff. ¶ 4, attached as Ex. C. to Tynan Aff.) Petitioner had difficulty tracking down the exact address at which Respondent was living with Petitioner's minor children. (*See* Griffin Aff. ¶ 5, attached as Ex. C to Tynan Aff.)

14. Petitioner reported the abduction to the Central Authority for Child Abduction in Ireland. (*See* Griffin Aff. ¶ 11, attached as Ex. C to Tynan Aff.)

15. Eventually, it was learned that Respondent had taken the minor children to Oak Park and LaGrange, Illinois. Since tracking down this information, Petitioner has had limited contact with the children and has often been denied any ability to speak with them at all. (*See* Griffin Aff. ¶ 7, attached as Ex. C to Tynan Aff.) The Irish Central Authority asked the United States authorities to intervene because Petitioner was worried about the health and welfare of Petitioner's children.

16. After tracking down the address where the children were living, Petitioner traveled to Chicago in December 2007 to check on his children. (Griffin Aff. ¶ 6, attached as Ex. C to Tynan Aff.)

17. On July 13, 2007, Petitioner filed an application for the return of the minor children through the Department of Justice, Equality and Law Reform of Ireland, that Country's administrator under the Hague Convention. (*See Hague Convention Application*, attached as Ex. A to Tynan Aff.)

18. On information and belief, the minor children are currently being illegally held in custody, confinement or restraint by Respondent at 343 6th Street, LaGrange, IL 60525.

COUNT I
(Respondent's Violation of the Hague Convention)

19. Petitioner repeats and realleges paragraphs 1 through 18 of this Petition as if fully set forth herein.

20. The minor children are under sixteen (16) years of age and are the biological children of Petitioner.

21. The children were habitual residents of Ireland at the time of the wrongful removal.

22. Respondent wrongfully removed the minor children from their habitual residence of Ireland within the meaning of Article 3 of the Convention and continues to wrongfully retain the minor children in Illinois in the United States despite efforts on the part of Petitioner to have the minor children returned.

23. Petitioner is also entitled to recover all necessary expenses incurred by bringing this Petition, including court costs, legal fees, foster home or other care during the course of

proceedings in the action and transportation costs related to the return of the child pursuant to 42 U.S.C. § 11607.

WHEREFORE, Petitioner/Father respectfully requests that this Court:

Order that the minor children be immediately returned to the physical custody of Petitioner for return to Petitioner's home in Ireland in accordance with the Convention.

Order that Respondent pay all of Petitioner's fees incurred by bringing this Petition including, but not limited to, court costs, legal fees, foster home or other care during the course of proceedings in the action and transportation costs related to the return of the children.

Dated: June 9, 2008

Respectfully submitted:

/s/ Monica Maria Tynan

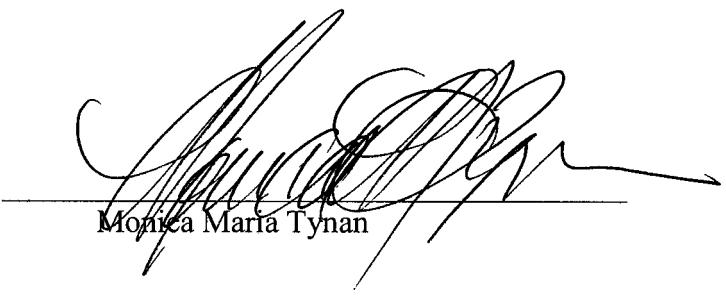
By one of the attorneys for Petitioner
John A. Griffin

Monica Maria Tynan, ARDC # 06210307
Steven V. Hunter, ARDC # 6277695
Quarles & Brady LLP
500 West Madison Street, Suite 3700
Chicago, IL 60661-2511
(312) 715-5000 - Telephone
(312) 715-5155 - Facsimile
mtynan@quarles.com
shunter@quarles.com

VERIFICATION

I am one of the attorneys for Petitioner. I make this verification on behalf of the Petitioner because Petitioner is absent from the United States. The above document is true of my own knowledge, except as to the matters that are stated upon information and belief. I declare, under penalty of perjury under the laws of the State of Illinois, that the foregoing is true and correct.

Executed this 9 th day of June, 2008, in Chicago, Illinois.



Monica Maria Tynan

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN A. GRIFFIN,)
Petitioner,)
v.) Case No.
TANYA GRIFFIN,)
Respondent.)

**AFFIDAVIT OF MONICA MARIA TYNAN IN SUPPORT OF PETITION FOR
RETURN OF CHILDREN TO PETITIONER PURSUANT TO THE HAGUE
CONVENTION ON THE CIVIL ASPECTS OF THE INTERNATIONAL
CHILD ABDUCTION REMEDIES ACT AND THE UNIFORM CHILD
CUSTODY JURISDICTION AND ENFORCEMENT ACT**

I, Monica Maria Tynan, declare that:

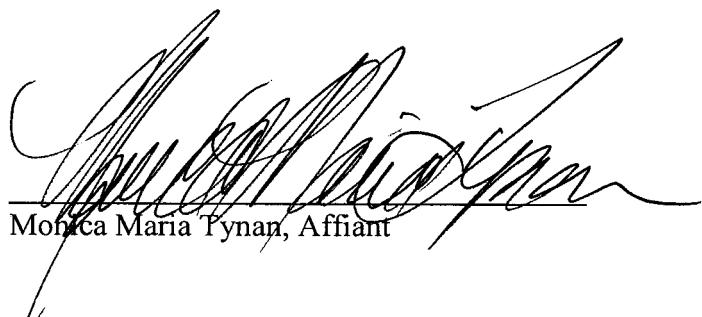
1. I am an attorney with the law firm of Quarles & Brady LLP and am licensed to practice law in the State of Illinois. I am one of the attorneys for Petitioner, and I make this affidavit in support of the Petition For Return Of Children To Petitioner Pursuant To The Hague Convention On The Civil Aspects Of International Child Abduction, The International Child Abduction Remedies Act and The Uniform Child Custody Jurisdiction And Enforcement Act.

2. True and correct copies of the following documents are attached to this affidavit:

- Exhibit A: Hague Convention Application
- Exhibit B: Declaration Establishing the Habitual Residence of the Children
Samuel Muirus Griffin, Isaac James Griffin, Margaret Eleanor Griffin and
Josephine Griffin ("Griffin Dec.")
- Exhibit C: Affidavit of John A. Griffin ("Griffin Aff.")

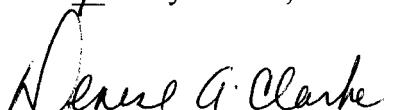
I declare under penalty of perjury under the laws of the State of Illinois that the foregoing is true and correct.

Executed this 9 th day of June, 2008 at Chicago, Illinois.



Monica Maria Tynan, Affiant

Sworn to and subscribed by me
this 9 th day of June, 2008.



Denise A. Clarke
My Commission expires:
Apr. 16. 2012

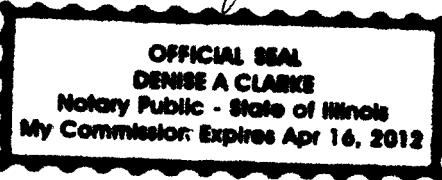


EXHIBIT 1-A



NB: Please complete Authorisation Form attached

1. Requesting Central Authority:- IRELAND

2. Requested Central Authority :- UNITED STATES OF AMERICA

3. Request under
(please indicate)

(i) Hague Convention on the Civil Aspects of International Child Abduction

yes

no

(ii) European Convention on Recognition and Enforcement of Decisions Concerning
Custody of Children and on Restoration of Custody of Children.

yes

no

4. Number of children in respect of whom application is being made:- 4

5. Nature of Request:- On JUNE 9th, 2007, MY WIFE TOOK MY FOUR
CHILDREN OUT OF IRELAND WITHOUT MY CONSENT OR AUTHORIZATION
AND REMOVED THEM TO THE UNITED STATES. THEY ARE NOW RESIDING
IN CHICAGO, IL., AT THE FOLLOWING ADDRESS:

122 S. KENILWORTH AVENUE,
OAK PARK, IL 60302

(CELL) 773. 628. 3301

6. *(Identify or name the child (name of the person to whom an application is being made.)*

6.(a) Identity of child

- (i) Name and first names:- GRIFFIN, SAMUEL MUIRIS
- (ii) Date of birth:- JANUARY 19TH, 1995
- (iii) Child will attain the age of 16 on:- JAN, 19, 2011
- (iv) Habitual residence before improper removal or retention:- CORK, IRELAND
- (v) Nationality:- IRISH & U.S.A. (Holds Dual Passports)
- (vi) Sex:- MALE
- (vii) Passport or identity card (give details and no. of document if any):- U.S. PASSPORT # ONLY - 08420190
(IRISH PASSPORT UNAVAILABLE - TAKEN BY MOTHER)
- (viii) Give description of child and enclose photo, if possible:- SAMUEL IS SECOND FROM RIGHT IN FAMILY PORTRAIT

6.(b) Identity of child

- (i) Name and first names:- GRIFFIN, ISAAC JAMES
- (ii) Date of birth:- FEBRUARY 6TH, 1998
- (iii) Child will attain the age of 16 on:- FEBRUARY 6TH, 2014
- (iv) Habitual residence before improper removal or retention:- CORK, IRELAND
- (v) Nationality:- IRISH & U.S.A. (Holds Dual Passports)
- (vi) Sex:- MALE
- (vii) Passport or identity card (give details and no. of document if any):- U.S. PASSPORT # ONLY - 088171993
(IRISH PASSPORT # UNAVAILABLE - IN MOTHER'S POSSESSION)
- (viii) Give description of child and enclose photo, if possible:- ISAAC IS FIRST ON RIGHT IN FAMILY PORTRAIT

6.(c) Identity of child

- (i) Name and first names:- GRIFFIN, MARGARET ELEANOR ("MAGGIE")
- (ii) Date of birth:- JULY 31ST, 1999
- (iii) Child will attain the age of 16 on:- JULY 31ST, 2015
- (iv) Habitual residence before improper removal or retention:- CORK, IRELAND.
- (v) Nationality:- IRISH & U.S.A. (HOLDS DUAL PASSPORTS)
- (vi) Sex:- FEMALE
- (vii) Passport or identity card (give details and no. of document if any):- U.S. PASSPORT # ONLY - 088171994
(IRISH PASSPORT # UNAVAILABLE IN MOTHER'S POSSESSION)
- (viii) Give description of child and enclose photo, if possible:- MAGGIE IS THIRD FROM RIGHT IN FAMILY PORTRAIT

6.(d) Identity of child

- (i) Name and first names:- JOSIE GRIFFIN, JOSEPHINE MARIE ("JOSIE")
- (ii) Date of birth:- APRIL 27TH, 2002
- (iii) Child will attain the age of 16 on:- APRIL 27TH, 2018
- (iv) Habitual residence before improper removal or retention:- CORK, IRELAND
- (v) Nationality:- IRISH, U.S.A. (HOLDS DUAL PASSPORTS)
- (vi) Sex:- FEMALE
- (vii) Passport or identity card (give details and no. of document if any):- UNAVAILABLE - BOTH PASSPORTS IN MOTHER'S POSSESSION
- (viii) Give description of child and enclose photo, if possible:- JOSIE IS FOURTH FROM RIGHT IN FAMILY PORTRAIT

7. Parents of child/children

(a) Mother

- (i) Name and first names:- GRIFFIN, TANYA LYNN
- (ii) Date and place of birth:- NOVEMBER 12TH, 1968. TUSCON, ARIZONA
- (iii) Address:- 122 S. KENILWORTH AVENUE,
OAK PARK, IL 60302
U.S.A.
- (iv) Nationality:- U.S. (HOLDS IRISH PASSPORT)
- (v) Occupation:- ?
- (vi) Habitual residence:- CORK, IRELAND
- (vii) Passport or identity card:- U.S. PASSPORT # 081812306
(Give details and no. of)

(b) Father

- (i) Name and first names:- GRIFFIN, JOHN ANTHONY
- (ii) Date and place of birth:- JUNE 13TH, 1962. TIPPERARY TOWN, IRELAND
- (iii) Address:- BALLYNILARD
TIPPERARY TOWN
IRELAND
- (iv) Nationality:- IRISH
- (v) Occupation:- SEEKING EMPLOYMENT IN EDUCATION SECTOR
- (vi) Habitual residence:- IRELAND
- (vii) Passport or identity card:- W 154187
(give details and no. of)

(c) Marriage/Divorce

- (i) Date and place of marriage:- JULY 14TH, 1990, ST. LOUIS, MO
- (ii) Date and place of divorce, if any:- N/A

- (i) Name and first names:- GRIFFIN, JOHN ANTHONY
- (ii) Date and place of birth:- JUNE 13TH, 1962, TIPPERARY TOWN
IRELAND
- (iii) Address:- BALLYNILARD
TIPPERARY TOWN
Co. TIPPERARY
- (iv) Relationship to child:- FATHER OF FOUR CHILDREN
- (v) Telephone no. (if any):- (062) 51514 - (087) 3233845
- (vi) Name and address of legal adviser (if any):- NONE

9. What are the factual or legal grounds justifying the request (e.g. Court Order):-

My WIFE ABDUCTED MY CHILDREN WITHOUT MY AUTHORIZATION
OR CONSENT.

10. Are there any civil proceedings in progress or intended:- No

11. Please indicate where the child is thought to be (and the reason why):-

122 S. KENILWORTH AVENUE
OAK PARK, IL 60302

(My WIFE EMAILED ADDRESS FOR PURPOSES OF SKYPE (INTERNET) ACCESS.)

12. Information on person alleged to have improperly removed or retained the child

- (i) Name and first names: GRIFFIN, TANYA LYNN
- (ii) Date and place of birth:- NOVEMBER 12TH, 1968. TUSCON, ARIZONA
- (iii) Address:- 122 S. KENILWORTH AVENUE
OAK PARK, IL 60302
- (iv) Relationship to the child:- MOTHER
- (v) Last known address:- 202 JULIA PLACE, BELLEVILLE, IL 62223
- (vi) Give description and enclose photo, if possible:- PHOTOGRAPH ENCLOSED

13. Case No: 100854-003923 Document 142 Filed: 06/06/2008 Page: 17 of 38
 information relating to the whereabouts of the child. (ie names, addresses and reasons why you believe these persons might have relevant information):-

KENORA & RYAN McMULLEN
 5808 POTOMAC ST.,
 ST. LOUIS, MO 63139-1927
 (314) 351-7197

JAN & MICHAEL CORDES
 202 JULIA PLACE
 BELLEVILLE, IL 62223
 (618) 960-6909

14. Please give the date, place, time and circumstances of the improper removal/retention:-

JUNE 9th, 2007. SHANNON AIRPORT. MY WIFE CLAIMED TO BE UNHAPPY IN OUR MARRIAGE, THEREFORE DECIDED THAT OUR CHILDREN'S BEST INTERESTS WOULD BE SERVED IF SHE ABDUCTED THEM FROM ME.

15. If the application is successful please give the following information in relation to the person to whom the child is to be returned:-

- (a) (i) Name and first names:- GRIFFIN, JOHN ANTHONY
 (ii) Date and place of birth:- JUNE 13th, 1962, TIPPERARY TOWN, IRELAND
 (iii) Telephone No:- (062) 51514 OR (087) 3233845

(b) Proposed arrangements for the return of the child: THEY WILL STAY WITH EITHER THEIR MOTHER OR I IN IRELAND UNTIL THEIR CUSTODY IS ESTABLISHED BY LAW

16. Is there any further information which it would be helpful to include with your application?

I CAN PROVIDE AMPLE EMAIL EVIDENCE OF MY WIFE'S DECEIT IN THIS MATTER.

17. Please list all documents which are enclosed with the application:

PHOTOGRAPHS -

My WIFE REMOVED ALL LEGAL DOCUMENTS FROM OUR HOME BEFORE HER DEPARTURE; THEREFORE, I DON'T HAVE

Signed:-

D. L. Bay
July 13, 2007

ANY BIRTH CERTS IN MY
 POSSESSION

Date:-

EXHIBIT 1-B

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN A. GRIFFIN,)	
)	
Petitioner,)	
)	
v.)	Case No.
)	
TANYA GRIFFIN,)	
)	
Respondent.)	

**DECLARATION ESTABLISHING THE HABITUAL RESIDENCE OF THE
CHILDREN SAMUEL MUIRIS GRIFFIN, ISAAC JAMES GRIFFIN, MARGARET
ELEANOR GRIFFIN AND JOSEPHINE MARIE GRIFFIN**

Petitioner, JOHN A. GRIFFIN ("Petitioner/Father"), appears specially by and through undersigned counsel and declares that the following statements are true:

1. Samuel Muiris Griffin, a male, is thirteen years old, and was born on January 19, 1995. Isaac James Griffin, a male, is ten years old, and was born on February 6, 1998. Margaret Eleanor Griffin, a female, is eight years old, and was born on July 31, 1999. Josephine Marie Griffin, a female, is six years old, and was born on April 27, 2002. All four of these children are the subject of this proceeding. The four minor children resided in Ireland with Petitioner from May and June 2005 until their mother abducted them on June 9, 2007 and brought them to the United States.

2. The habitual residence of Samuel, Isaac, Margaret and Josephine is located at 1 Bernadette Place, Western Road, Cork City, Ireland. The children were domiciled in that location with Petitioner and Respondent prior to the wrongful removal. Mr. Griffin currently resides at Radharc Darach, Apartment #6, Belmont, Nenagh, County Tipperary, Ireland.

3. It is believed that the children are residing with the Respondent, their mother, at 343 6th Street, LaGrange, Illinois 60525. The minor children have been in the United States since June 9, 2007, since which time the Respondent has failed to return the children to their habitual residence.

4. After removing the children to the United States, my wife sent correspondence, indicating the children would stay with her in Chicago and that she would provide them with proper schooling and adequate care.

5. I reported the children's abduction to the Central Authority for Child Abduction in Ireland.

Dated: June 6, 2008

Respectfully submitted:

[See attached]

Petitioner John A. Griffin

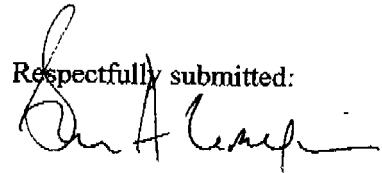
Monica Maria Tynan, ARDC # 06210307
Steven V. Hunter, ARDC # 6277695
Quarles & Brady LLP
500 West Madison Street, Suite 3700
Chicago, IL 60661-2511
(312) 715-5000 - Telephone
(312) 715-5155 - Facsimile
mtynan@quarles.com
shunter@quarles.com

residence.

4. After removing the children to the United States, my wife sent correspondence, indicating the children would stay with her in Chicago and that she would provide them with proper schooling and adequate care.
5. I reported the children's abduction to the Central Authority for Child Abduction in Ireland.

Dated: June 6, 2008

Respectfully submitted:


Petitioner John A.
Griffin

Monica Maria Tynan

ARDC # 06210307

Quarles & Brady LLP
500 West Madison Street, Suite 3700

Chicago, IL 60661-2511

(312) 715-5000 - telephone

(312) 715-5155 - facsimile

mtynan@quarles.com

Stephen V. Hunter

ARDC # 6277695

Quarles & Brady LLP

500 West Madison Street, Suite 3700

Chicago, IL 60661-2511

(312) 715-5000 - telephone

(312) 715-5155 - facsimile

shunter@quarles.com

EXHIBIT 1-C

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN A. GRIFFIN,)
Petitioner,)
v.) Case No.
TANYA GRIFFIN,)
Respondent.)

AFFIDAVIT OF JOHN A. GRIFFIN

NOW COMES THE AFFIANT, having been duly sworn according to law, deposes and states the following:

1. I am John A. Griffin and I was married to Tanya Griffin and have four children with her, to wit: Samuel Muiris Griffin born January 19, 1995, Isaac James Griffin born February 6, 1998, Margaret Eleanor Griffin born July 31, 1999 and Josephine Marie Griffin born April 27, 2002 (referred to collectively hereinafter as the "minor children.")
2. Tanya Griffin ("Tanya"), the minor children and I were residents of 1 Bernadette Place, Western Road, Cork City, Ireland since June of 2005.
3. On June 9, 2007 Tanya absconded from Ireland with the minor children without my permission.
4. Sometime shortly after arriving in the United States, Tanya confirmed that she did not intend to return to Ireland and that she was keeping the minor children with her in the United States and would provide them with proper schooling and adequate care.
5. I had to do research and investigation to locate the address at which she was living with the minor children.

6. Based on my investigation, I believe Tanya Griffin is currently living at 343 6th Street, LaGrange, Illinois 60525. After tracking down the address where the children were living, I visited them briefly in December 2007.

7. The minor children are citizens of the United States and copies of their birth certificates are attached hereto and made a part hereof as Group Exhibit A.

8. Tanya Griffin is also a citizen of the United States.

9. Since Tanya absconded from Ireland with the minor children in June of 2007 I have made repeated requests that she return the children to Ireland, all of which have been refused. In addition, I have had limited contact with the children and have often been denied any ability to speak with them at all.

10. Before Tanya absconded with the minor children, it was our intent to raise our children in Ireland. Indeed, the children were registered for school and planned to continue their education in Ireland.

11. I reported the children's abduction to the Central Authority for Child Abduction in Ireland.

12. Further affiant sayeth not.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this ____th day of June, 2008 at _____, Ireland.

[See Attached]
John A. Griffin, Affiant

Sworn to and subscribed by me
this ____th day of June, 2008.

My Commission expires:

7. The minor children are citizens of the United States and copies of their birth certificates are attached hereto and made a part hereof as Group Exhibit A.
8. Tanya Griffin is also a citizen of the United States.
9. Since Tanya absconded from Ireland with the minor children in June of 2007 I have made repeated requests that she return the children to Ireland, all of which have been refused. In addition, I have had limited contact with the children and have often been denied any ability to speak with them at all.
10. Before Tanya absconded with the minor children, it was our intent to raise our children in Ireland. Indeed, the children were registered for school and planned to continue their education in Ireland.
11. I reported the children's abduction to the Central Authority for Child Abduction in Ireland.
12. Further affiant sayeth not.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 6 th day of June, 2008 at NENAGH GARDA STATION, Ireland.

John A. Griffin, Affiant

Signature Above Witnessed.

Sworn to and subscribed by me

this 6 th day of June, 2008.

My Commission expires:

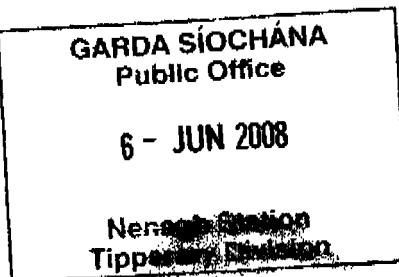


EXHIBIT 1-C-1